

Filed in open court 3/8/07 (ew)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 WILLIAM JOHN STATTS,)
)
 Defendant.)

07-43M

[Eastern District of Virginia
Case No. 3:07-MJ-132]

MOTION FOR DETENTION HEARING

NOW COMES the United States and moves for the pretrial detention of the defendant, pursuant to 18 U.S.C. § 3142(e) and (f) and Rule 5. In support of the motion, the United States alleges the following:

1. **Eligibility of Case.** This case is eligible for a detention order because the case involves (**check all that apply**):

- ☐ Crime of violence (18 U.S.C. § 3156)
- ☐ Maximum sentence life imprisonment or death
- ☐ 10+ year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☐ Minor victim; possession or use of firearm, destructive device or other dangerous weapon; or failure to register under 18 U.S.C. § 2250
- ☒ Serious risk defendants will flee
- ☐ Serious risk obstruction of justice

2. **Reason For Detention.** The court should detain defendants because there are no conditions of release which will reasonably assure (**check one or both**):

- ☒ Defendants' appearance as required
- ☐ Safety of any other person and the community

3. **Rebuttable Presumption.** The United States WILL NOT invoke the rebuttable presumption against defendant under § 3142(e). (If yes) The presumption applies because (**check one or both**):

___ Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)

___ Previous conviction for "eligible" offense committed while on pretrial bond

4. **Time For Detention Hearing.** The United States requests the court conduct the detention hearing,

___ At first appearance

X After continuance of 3 days (not more than 3).

5. **Temporary Detention.** The United States request the temporary detention of the defendant for a period of _____ days (not more than 10) so that the appropriate officials can be notified since (**check 1 or 2, and 3**):

1. At the time the offense was committed the defendant was:

___ (a) on release pending trial for a felony;

___ (b) on release pending imposition or execution of sentence, appeal of sentence or conviction, or completion of sentence for an offense;

___ (c) on probation or parole for an offense.

___ 2. The defendant is not a citizen of the U.S. or lawfully admitted for permanent residence.

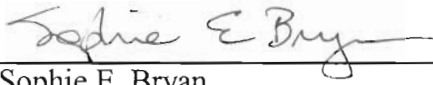
___ 3. The defendant may flee or pose a danger to any other person or the community.

6. Other Matters.

DATED this 8th day of March, 2007.

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

BY: 
Sophie E. Bryan
Assistant United States Attorney